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Attorneys for Plaintiff, Edward M. Wolkowitz,
solely in his capacity as Chapter 7 Trustee of the
bankruptcy estate of Interworks Unlimited Inc.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

EDWARD M. WOLKOWITZ, solely
in his capacity as Chapter 7 Trustee of
the bankruptcy estate of Interworks
Unlimited Inc,
,

Plaintiff,

v.

DIGITAL GADGETS, LLC, a New
Jersey limited liability company,

Defendant,

And related counterclaim.

Case No. 2:17-cv-04983-TJH-KSx

**Dismissal of Entire Action by
Stipulation**

Final Pretrial Conference:
Date: July 7, 2025
Time: 10:00 a.m.

Plaintiff Edward M. Wolkowitz (the “**Trustee**”), Chapter 7 Trustee of the
bankruptcy estate of Interworks Unlimited Inc. (“**Interworks**”), and Defendant
Digital Gadgets, LLC (“**Defendant**”), dismiss this entire action as set forth below
via this stipulation.

Recitals

- A. The Trustee and Defendant are the only parties to this action.
- B. The parties have reached a settlement of this entire action and other
disputes between the parties, as set forth in that certain *Settlement and Release*

1 *Agreement* dated September 15, 2024 (the “**Settlement Agreement**”) that has been
2 approved in the chapter 7 case of *In re Interworks Unlimited Inc.*, no. 2:19-bk-
3 17990-VZ, Judge Vince P. Zurzolo presiding, by order entered on February 3, 2025
4 (Bankr. DE 209).

5 C. The final pre-trial conference in this action is currently set for July 7,
6 2025 (DE 160, entered November 13, 2024).

7 **Dismissal by Stipulation**

8 In accordance with Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil
9 Procedure, the Trustee and Defendant dismiss by this stipulation the entirety of this
10 action, including the complaint (DE 1, filed July 7, 2017) and the first amended
11 counterclaim (DE 21, November 20, 2017), with prejudice, each side to bear their
12 own fees and costs, subject to the terms of the Settlement Agreement.

13 Dated: March 13, 2025

LEVENE, NEALE, BENDER, YOO &
GOLUBCHIK L.L.P.

14 By: /s/ Kurt Ramlo

KURT RAMLO

15 Attorneys for Plaintiff, Edward M. Wolkowitz,
16 Chapter 7 Trustee for the bankruptcy estate of
Interworks Unlimited Inc.

17 Dated: March 13, 2025

LAZARUS AND LAZARUS, P.C.

18 By: /s/ Harlan M. Lazarus

19 HARLAN M. LAZARUS, admitted pro hac
20 vice

Attorneys for Defendant, Digital Gadgets, LLC

21
22 **Attestation of Signature**

23
24 I, Kurt Ramlo, hereby attest that all other signatories listed, and on whose
25 behalf the filing is submitted, concur in the filing’s content and have authorized the
26 filing.

27 Dated: March 13, 2025

/s/ Kurt Ramlo